

1
2
3
4
5
6
7
The Honorable Richard A. Jones
8
9

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
NORTHWEST IMMIGRANT RIGHTS
PROJECT (“NWIRP”), a nonprofit Washington
public benefit corporation; and YUK MAN
MAGGIE CHENG, an individual,

Plaintiffs,

v.

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
JEFFERSON B. SESSIONS III, in his official
capacity as Attorney General of the United
States; UNITED STATES DEPARTMENT OF
JUSTICE; EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW; JUAN OSUNA, in
his official capacity as Director of the Executive
Office for Immigration Review; and JENNIFER
BARNES, in her official capacity as
Disciplinary Counsel for the Executive Office
for Immigration Review,

Defendants.

No. 2:17-cv-00716

DECLARATION OF JAIME
DROZD ALLEN IN SUPPORT OF
PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION

Note on Motion Calendar:
June 30, 2017

1 I, Jaime Drozd Allen, declare the following:

2 1. I am a partner with Davis Wright Tremaine LLP ("DWT") and am counsel of
3 record for Plaintiffs in this matter. I have personal knowledge of the facts stated in this
4 declaration and am competent to testify to the same.

5 2. Attached hereto as **EXHIBIT A** is a true and correct copy of excerpts from the
6 Verbatim Report of Proceedings for the May 17, 2017 Temporary Restraining Order hearing
7 heard before Judge Richard A. Jones.

8 3. Attached hereto as **EXHIBIT B** is a true and correct copy of the Declaration of
9 Kursten Phelps, Director of Legal and Social Services at Tahirih Justice Center.

10 4. Attached hereto as **EXHIBIT C** is a true and correct copy of the Declaration of
11 R. Linus Chan, Clinical Professor of Law and Supervisor of Detainee Rights Clinic at the
12 James H. Binger Center for New Americans at the University of Minnesota Law School.

13 5. Attached hereto as **EXHIBIT D** is a true and correct copy of the Declaration of
14 Lisa Weissman-Ward, Clinical Supervising Attorney for Stanford Law School Immigrants'
15 Rights Clinic.

16 6. Attached hereto as **EXHIBIT E** is a true and correct copy of the Declaration of
17 Cristina Dos Santos, Senior Attorney for the Immigration Program at the Community Legal
18 Services in East Palo Alto.

19 7. Attached hereto as **EXHIBIT F** is a true and correct copy of the Declaration of
20 Jon Bauer and Jessica Anna Cabot with the University of Connecticut School of Law Asylum
21 and Human Rights Clinic.

22 8. Attached hereto as **EXHIBIT G** is a true and correct copy of the Declaration of
23 Caroline Devan Sennett, Staff Attorney and Site Supervisor for the Hartford Office of the
24 Davis Wright Tremaine LLP
25 DECLARATION OF JAIME DROZD ALLEN RE:
26 MOTION FOR PRELIMINARY INJUNCTION - 2
27 (Case No. 2:17-cv-00716)

LAW OFFICES
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
206.622.3150 main • 206.757.7700 fax

1 International Institute of Connecticut.
2

3 9. Attached hereto as **EXHIBIT H** is a true and correct copy of the Declaration of
4 Muneer I. Ahmad, Clinical Professor of Law within the Worker and Immigrant Rights
5 Advocacy Clinic at Yale Law School.
6

7 10. Attached hereto as **EXHIBIT I** is a true and correct copy of the Declaration of
8 John Keller, Executive Director of the Immigrant Law Center of Minnesota.
9

10 11. Attached hereto as **EXHIBIT J** is a true and correct copy of the Declaration of
11 Richard Stolz, Executive Director of OneAmerica.
12

13 12. Attached hereto as **EXHIBIT K** is a true and correct copy of the Declaration of
14 Susan Roche, Executive Director of the Immigrant Legal Advocacy Project in Maine.
15

16 13. Attached hereto as **EXHIBIT L** is a true and correct copy of the Declaration of
17 Cheryl Little, Executive Director of Americans for Immigrant Justice.
18

19 14. Attached hereto as **EXHIBIT M** is a true and correct copy of the Declaration of
20 Judy London, Directing Attorney of the Immigrants' Rights Project for Los Angeles Public
21 Counsel.
22

23 15. Attached hereto as **EXHIBIT N** is a true and correct copy of the Declaration of
24 Frances Miriam Kreimer, Senior Attorney at the Deportation Defense and Legal Advocacy
25 Program at Dolores Street Community Services.
26

27 16. Attached hereto as **EXHIBIT O** is a true and correct copy of the Declaration of
Nancy Kelly, Managing Attorney of the Immigration Unit at Greater Boston Legal Services.
28

17. Attached hereto as **EXHIBIT P** is a true and correct copy of the Declaration of
29 Juliann Bildhauer, Co-Director of Legal Services for Kids in Need of Defense (KIND).
30

31 18. Attached hereto as **EXHIBIT Q** is a true and correct copy of the Declaration of
32
33

1 Lynn Marcus, Professor of the Practice and Co-Director of the Immigration Law Clinic at the
2 University of Arizona James E. Rogers College of Law.

3 19. Attached hereto as **EXHIBIT R** is a true and correct copy of the Declaration of
4 Paul S. Zoltan, founder of the Refugee Support Network and liaison with Houston Asylum
5 Office of the American Immigration Lawyers Association.

6 20. Attached hereto as **EXHIBIT S** is a true and correct copy of the Declaration of
7 Valerie Anne Zukin, Lead Attorney Coordinator for the Northern Collaborative for Immigrant
8 Justice and attorney for the Justice & Diversity Center of The Bar Association of San
9 Francisco.

10 21. Attached hereto as **EXHIBIT T** is a true and correct copy of the Declaration of
11 Alison Pennington, Immigration Senior Staff Attorney at Centro Legal.

12 22. Attached hereto as **EXHIBIT U** is a true and correct copy of the Declaration of
13 Daniel Werner, Director of the Southeast Immigrant Freedom Initiative, a project of the
14 Southern Poverty Law Center.

15 23. Attached hereto as **EXHIBIT V** is a true and correct copy of the Declaration of
16 John H. Fleming, Pro Bono Partner at Eversheds Sutherland (US), LLP.

17 24. Attached hereto as **EXHIBIT W** is a true and correct copy of Declaration of
18 Ellyn Haikin Josef, Pro Bono Counsel at Vinson & Elkins, LLP.

19 25. Attached hereto as **EXHIBIT X** is a true and correct copy of the Declaration of
20 Stacey Slater, Pro Bono Partner at Nixon Peabody, LLP.

21 26. Attached hereto as **EXHIBIT Y** is a true and correct copy of the Declaration
22 from Rene A. Kathawala, Pro Bono Counsel at Orrick, Herrington & Sutcliffe LLP.

23 27. Attached hereto as **EXHIBIT Z** is a true and correct copy of the Declaration of

1 Leah E. Medway, Pro Bono Counsel at Perkins Coie LLP.
2

3 28. Attached hereto as **EXHIBIT AA** is a true and correct copy of the Declaration
4 of William A. Van Nortwick, Jr., Partner-in-charge of Pro Bono at Akerman LLP.
5

6 29. Attached hereto as **EXHIBIT BB** is a true and correct copy of the Declaration
7 of Audra J. Soloway, Partner and Co-Chair of Public Matters Committee at Paul Weiss Rifkind
8 Wharton & Garrison LLP.
9

10 30. Attached hereto as **EXHIBIT CC** is a true and correct copy of the Declaration
11 of Harrison J. Frahn, Litigation Partner at Simpson Thacher & Bartlett, LLP.
12

13 31. Attached hereto as **EXHIBIT DD** is a true and correct copy of the Declaration
14 of Kathryn Fritz, Managing Partner of Fenwick & West LLP.
15

16 32. Attached hereto as **EXHIBIT EE** is a true and correct copy of the Declaration
17 of David A. Lash, Managing Counsel for Pro Bono and Public Interest Services at O'Melveny
18 & Myers LLP.
19

20 33. Attached hereto as **EXHIBIT FF** is a true and correct copy of the Declaration of
21 Claire Loeks Davis, Seattle chair of the Pro Bono Committee at Lane Powell PC.
22

23 34. Attached hereto as **EXHIBIT GG** is a true and correct copy of the Declaration
24 of Maureen P. Alger, Pro Bono Partner for Cooley LLP.
25

26 35. Attached hereto as **EXHIBIT HH** is a true and correct copy of the Declaration
27 of Marjorie Press Lindblom, Counsel and Co-Chair of the Pro Bono Management Committee at
Kirkland & Ellis LLP.
28

29 36. Attached hereto as **EXHIBIT II** is a true and correct copy of the Declaration
30 and accompanying exhibit of Edward B. Murray, Mayor of the City of Seattle.
31

1 I declare under penalty of perjury under the laws of the United States of America that
2 the foregoing is true and correct to the best of my knowledge and belief.
3

4 EXECUTED at Seattle, Washington, this 8th day of June, 2017.
5

6 By: /s Jaime Drozd Allen
7 Jaime Drozd Allen, WSBA #35742
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2017, I filed the foregoing using CM/ECF which will cause a copy to be sent to the following:

Attorneys for Defendants Jefferson B. Sessions, III Attorney General of the United States; United States Department of Justice; Executive Office for Immigration Review; Juan Osuna; Jennifer Barnes

Carlton Frederick Sheffield carlton.f.sheffield@usdoj.gov
Gisela A. Westwater gisela.westwater@usdoj.gov
Gladys M. Steffens Guzman Gladys.Steffens-Guzman@usdoj.gov;
Victor M. Mercado-Santana victor.m.mercado-santana@usdoj.gov
victor.m.mercado@gmail.com

Attorneys for Amicus Attorney General of Washington

Attorneys for Amicus American Civil Liberties Union of Washington (ACLU)

Andrew Garcia Murphy agm@hcmp.com,
brenda.partridge@hcmp.com

Michael J. Ewart jake.ewart@hcmp.com,
angie.perkins@hcmp.com

Attorneys for Amicus Immigrant Legal Rights Organization

John J Connolly jconnolly@zuckerman.com

Rachel F. Cotton RCotton@zuckerman.com

By s/ Jaime Drozd Allen
Jaime Drozd Allen, WSBA #35742
Attorney for Plaintiffs

DECLARATION OF JAIME DROZD ALLEN RE:
MOTION FOR PRELIMINARY INJUNCTION - 7
(Case No. 2:17-cv-00716)

Davis Wright Tremaine LLP
LAW OFFICES
1201 Third Avenue, Suite 2200
Seattle, WA 98101-3045
206.622.3150 main • 206.757.7700 fax